

CHRISTOPHER J. CHRISTIE
United States Attorney
By: J. ANDREW RUYMANN
United States Attorney's Office
402 East State Street, Room 430
Trenton, New Jersey 08608
(609) 989-2190
Attorney for Defendant

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MAR 26 2008

AT 8:30 _____ M
WILLIAM T. WALSH
CLERK

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

JOSEPH I. MAMMAN,	:	Hon. Mary L. Cooper
	:	
Plaintiff,	:	Civil Action No. 06-2688
	:	
v.	:	
	:	
ELAIN CHAO, Secretary,	:	
U.S. Department of Labor,	:	
	:	
Defendant.	:	
	:	

STIPULATION AND ORDER FOR
CONFIDENTIAL TREATMENT OF PRIVACY ACT INFORMATION

In the course of discovery in this matter in which prohibited discrimination is alleged, plaintiff may request various records which defendants believe contain information protected by the Privacy Act of 1974, 5 U.S.C. §552a. In order to permit plaintiff to discover information, records and documents that may be relevant to this case without undermining the legislative purposes of the Privacy Act, pursuant to the Privacy Act and Rule 26 of the Federal Rules of Civil Procedure, the parties agree that the following conditions shall govern all

information, records and documents (hereinafter "Information") protected by the Privacy Act, respecting employees, other than plaintiff, of the U.S. Department of Labor, disclosed by defendant through voluntary production or in response to plaintiff's written and other discovery, including depositions, in this matter:

1. Any Information shall be kept confidential and shall be utilized by plaintiff solely in the furtherance of the litigation in this case, Civil Action No. 06-2688.

2. None of the Information shall be disseminated to any persons except plaintiff, counsel for plaintiff, staff of plaintiff's counsel, experts retained by plaintiff, or witnesses whose prospective testimony requires that they be shown such material, subject to objections (other than Privacy Act objections) raised by defendant under the Federal Rules of Civil Procedure, which objections are not abrogated by this Stipulation and Order.

3. Persons who have access to Information subject to this Stipulation and Order shall, under the provisions of the Privacy Act, follow procedures sufficient to preclude any unauthorized disclosure of Information that would constitute an unwarranted invasion of personal privacy while such Information is in their custody. Specifically, this includes continuing control and supervision of documents and any Information derived

from them to preclude unauthorized or accidental disclosure. Information generated from documents in different form must be afforded the same protection as the source documents.

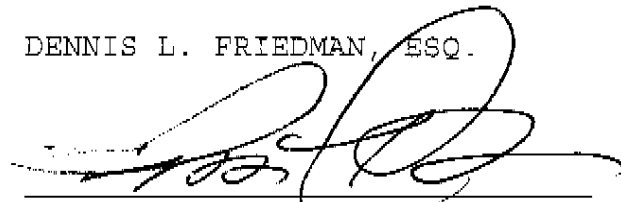
4. Plaintiff and plaintiff's counsel shall provide a copy of this Stipulation and Order to any individual who has access to Information produced subjected to this Stipulation and Order, and will obtain written acknowledgment that the terms of this Stipulation and Order are understood by such individual.

5. At the request of either party, the Court may order that any Information filed with the Court shall be filed under seal or other appropriate designation to ensure and preserve confidentiality.

6. All Information subject to this Stipulation and Order, including all copies or reproductions of such Information in any form, shall be returned to defendant's counsel within sixty (60) days from the time for appeal of any final judgment in this case. In case of an appeal, such documents shall be returned within sixty (60) days of the final decision on appeal or at the end of the time for filing of a petition for writ of certiorari.

We consent to the form and entry of this Stipulation and Order.

DENNIS L. FRIEDMAN, ESQ.


By: DENNIS L. FRIEDMAN, ESQ.
Attorney for Plaintiff

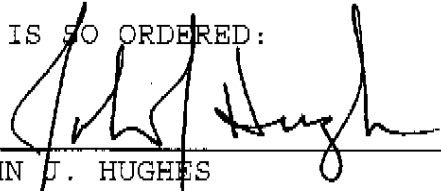
Dated: 10/2/07

CHRISTOPHER J. CHRISTIE
United States Attorney


By: J. ANDREW RUYMANN
Assistant U.S. Attorney
Attorney for Defendant

Dated: 10/3/07

IT IS SO ORDERED:


JOHN J. HUGHES
United States Magistrate Judge

Dated: 3/25/08